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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$19,100.00 IN  
U.S. CURRENCY,

15 Defendant.  
16

2:24-MC-00169-DJC-DB

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

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18 It is hereby stipulated by and between the United States of America and potential claimant Steven  
19 Zangrilli (“claimant”), by and through their respective counsel, as follows:

20 1. On or about January 25, 2024, claimant filed a claim in the administrative forfeiture  
21 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$19,100.00 in U.S.  
22 Currency (hereafter “defendant currency”), which was seized on November 2, 2023.

23 2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required  
24 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a  
25 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant  
26 has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative  
2 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the  
3 parties. That deadline is April 24, 2024.

4 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to June  
5 24, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the  
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
7 forfeiture.

8 5. Accordingly, the parties agree that the deadline by which the United States shall be  
9 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
10 alleging that the defendant currency is subject to forfeiture shall be extended to June 24, 2024.

11 Dated: 4/23/2024

PHILLIP A. TALBERT  
United States Attorney

12  
13 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

14  
15 Dated: 4/23/2024

/s/ Eric A. Pack  
ERIC A. PACK  
Attorney for potential claimant  
Steven Zangrilli  
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Glen Cove, NY 11542  
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(Signature authorized by phone)

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21 **IT IS SO ORDERED.**

22  
23 Dated: April 24, 2024

/s/ Daniel J. Calabretta  
THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE